

Holland N. O'Neil (TX 14864700)

Jason Binford (TX 24045499)

Shiva D. Beck (TX 24086882)

Melina N. Bales (TX 24106851)

FOLEY GARDERE

FOLEY & LARDNER LLP

2021 McKinney Avenue, Ste. 1600

Dallas, Texas 75201

Telephone: (214) 999.3000

Facsimile: (214) 999.4667

honeil@foley.com

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re:

	§	
	§	
ACIS CAPITAL MANAGEMENT, L.P.,	§	Case No. 18-30264-SGJ-7
ACIS CAPITAL MANAGEMENT GP, LLC,	§	Case No. 18-30265-SGJ-7
	§	(Jointly administered under
Debtors.	§	Case No. 18-30264-SGJ-7)

**STATEMENT OF ISSUES BY APPELLANTS
NEUTRA, LTD., HIGHLAND CLO FUNDING LTD., AND CLO HOLDCO LTD.**

Appellants Neutra Ltd., Highland CLO Fundings Ltd., and CLO Holdco Ltd. state the following issues for the appeal of the *Order Denying . . . Motion to Intervene* and the *Order for Relief*:

1. Does the bankruptcy court have subject matter jurisdiction?
2. Did the bankruptcy court err in not compelling arbitration (Doc. 75)?
3. Did the bankruptcy court err in denying the motion to intervene (Doc. 114)?
4. Did the bankruptcy court err in issuing the Order for Relief (Doc. 119)?
5. Were fact findings supporting these rulings clearly erroneous (Doc. 113)?
6. Did the bankruptcy court err in not dismissing the bankruptcy cases?

These are the issues for appeal of those same orders in Case No. 18-30265-SGJ-7 (see Docket Nos. 114 and 137 therein).

Respectfully submitted,

/s/ Holland N. O'Neil

Holland N. O'Neil
Texas Bar No. 14864700
Jason Binford
Texas Bar No. 24045499
Shiva D. Beck
Texas Bar No. 24086882
Melina N. Bales
Texas Bar No. 24106851
Foley Gardere
Foley & Lardner LLP
2021 McKinney, Suite 1600
Dallas, Texas 75201
Tel: 214.999.3000
Fax: 214.999.4667
honeil@foley.com
jbinford@foley.com
sbeck@foley.com
mbales@foley.com

Counsel for:
Neutra Ltd.
Highland CLO Fundings Ltd.
CLO Holdco Ltd.

CERTIFICATE OF SERVICE

I certify that on May 7, 2018, a copy of this document was served through the court's ECF system on all counsel below and on all others who registered for electronic notice:

Warren A. Ustaine
Coel Schotz P.C.
25 Main Street
Hackensack, NJ 07601
wustaine@coleschotz.com

Michael D. Warner
Cole Schotz P.C.
1700 City Center Tower II
301 Commerce Street
Fort Worth, TX 76102
mwarner@coleschotz.com

Rakhee V. Patel
Winstead PC
2728 N. Harwood Street, Suite 500
Dallas, Texas 75201
rpatel@winstead.com

David W. Elmquist
Reed & Elmquist, P.C.
501 N. College Street
Waxahachie, TX 75165
delmquist@bcylawyers.com

/s/ Holland N. O'Neil
Holland N. O'Neil